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2013 Annual Progress Report and Master Schedule Update Revision 0

Remedial Investigation/Feasibility Study Peoples Gas Light and Coke Company Former Manufactured Gas Plant Sites

Project No: 1982

October 31, 2013

US EPA RECORDS CENTER REGION 5



ENVIRONMENTAL CONSULTANTS

234 W. FLORIDA STREET, FIFTH FLOOR MILWAUKEE, WISCONSIN 53204 (P) 414.837.3607 (F) 414.837.3608

Mr. Ross del Rosario Remedial Project Managers USEPA, Region 5 77 W. Jackson Boulevard Chicago, IL 60604-3590 October 31, 2013 (1982/7.0a)

RE:

2013 Annual Progress Report and Master Schedule Update – Revision 0

Peoples Gas Light and Coke Company's Former Manufactured Gas Plant Sites

CERCLA Docket No.: V-W-08-C-917

Dear Mr. del Rosario:

On behalf of Integrys Business Support, LLC (IBS), managing Peoples Gas Light and Coke Company's (PGL) former manufactured gas plant (MGP) sites, please find enclosed two hard copies of the 2013 Annual Progress Report and Master Schedule Update for the Chicago sites. This report summarizes activities performed between October 31, 2012 and October 31, 2013 and provides a proposed schedule for future activities.

This 2013 Annual Progress Report has been prepared in accordance with Task 8, Subtask 8.2, of the Statement of Work (SOW) attached to the Settlement Agreement and Administrative Order on Consent (Settlement Agreement) between the United States Environmental Protection Agency (USEPA) and PGL, effective October 31, 2008.

Please do not hesitate to contact Mr. Naren Prasad (IBS) at 312.240.4569 if you have any questions regarding this document.

Laurie L. Parsons, PE

Principal Engineer

Sincerely,

NATURAL RESOURCE TECHNOLOGY, INC.

Jennifer M. Hagen, PE Senior Engineer

2 hard copies and 2 CD copies

cc:

Enc.:

Mr. Brian Bartoszek, IBS (email only)

Mr. Naren Prasad, IBS (email only)

Mr. Doyle Wilson, IEPA (hard copy and CD copy)

Mr. Dave Klatt, USEPA Contractor – CH2MHill (hard copy and CD copy)

1982 PGL Annual Progress and Schedule Update R del Rosario trans 121031

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ARAR Applicable or Relevant and Appropriate Requirements

BMc Burns and McDonnell

CSM Generalized Conceptual Site Model

FS Feasibility Study
FSP Field Sampling Plan
HASP Health and Safety Plan

IEPA Illinois Environmental Protection Agency

IBS Integrys Business Support, LLC

MGP Manufactured Gas Plant

NRT Natural Resource Technology, Inc

OU Operable Unit

PGL Peoples Gas Light and Coke Company

QAPP Quality Assurance Project Plan
RAF Risk Assessment Framework

ROD Record of Decision

RI Remedial Investigation

RPM Remedial Project Manager

SOW Statement of Work

SSWP Site-Specific Work Plan

USEPA US Environmental Protection Agency

This Annual Progress Report has been prepared in accordance with Task 8, Subtask 8.2 of the Statement of Work (SOW) attached to the Settlement Agreement and Administrative Order on Con (Settlement Agreement) between the U.S. Environmental Protection Agency (USEPA) and Peoples Light and Coke Company (PGL), a subsidiary of Integrys Energy Group, effective October 31, 2008 (2008c). Also included in this report is a Master Schedule Update that includes the general schedule Remedial Investigation/Feasibility Study (RI/FS) activities at each Site. The Annual Progress Repo Master Schedule Update address PGL's former manufactured gas plant (MGP) Sites located in Chillinois. The sites include. Crawford Station, North Branch Site (consisting of Division Street Station Operable Unit (OU), North Station OU, and Willow Street-Hawthorne Avenue Station OU), North S Avenue Station, and South Branch Site (consisting of 22nd Street Station Upland OU, Hough Place Station Upland OU, South Station Upland OU, Throop Street Station OU and South Branch River Outpand OU, South Station Upland OU, Throop Street Station OU and South Branch River Outpand OU, South Station Upland OU, Throop Street Station OU and South Branch River Outpand OU, South Station Upland OU, Throop Street Station OU and South Branch River Outpand OU, Throop Street Station OU and South Branch River Outpand OU, Throop Street Station OU and South Branch River Outpand OU, Throop Street Station OU and South Branch River Outpand OU, Throop Street Station OU and South Branch River Outpand OU, Throop Street Station OU and South Branch River Outpand OU, Throop Street Station OU and South Branch River Outpand OU, Throop Street Station OU and South Branch River Outpand OU, Throop Street Station OU and South Branch River Outpand OU and South B	Scope Annual Progress Report has been preparament of Work (SOW) attached to the Set ement Agreement) between the U.S. Envand Coke Company (PGL), a subsidiary Sc). Also included in this report is a Maste edial Investigation/Feasibility Study (RI/Fer Schedule Update address PGL's forms. The sites include. Crawford Station, Nable Unit (OU), North Station OU, and Wile Station, and South Branch Site (consion Upland OU, South Station Upland OU rys Business Support, LLC (IBS) manage. Overview Teport addresses the following Section 2: Multi-Site Document Progress Section 4: Proposed Master Schedulary Schedulary Section 4: Proposed Master Schedulary Schedu	tlement Agreement and Administrative Order on Conse vironmental Protection Agency (USEPA) and Peoples G of Integrys Energy Group, effective October 31, 2008 er Schedule Update that includes the general schedule S) activities at each Site. The Annual Progress Report a er manufactured gas plant (MGP) Sites located in Chica forth Branch Site (consisting of Division Street Station
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2 MULTI-SITE DOCUMENTS

Under the Settlement Agreement and SOW, Multi-Site documents are used to set forth general approaches and concepts to streamline subsequent site-specific work plans and minimize review times. The Multi-Site RI documents are used to maintain a consistent approach to investigate and assess potential risk at each site. The Multi-Site FS Support Document is used to develop general response actions and technologies appropriate for MGP sites.

This section summarizes the status of the Multi-Site Documents

2.1 Multi-Site RI Documents

USEPA has approved all Multi-Site RI Documents submitted between May 7, 2007 and September 8, 2008. The Multi-Site RI Documents set forth a consistent approach for Integrys Energy Group's Illinois and Wisconsin-based subsidiary companies under the USEPA's lead. Section 1.2.1 of the SOW discusses the Multi-Site RI Documents which include.

- Multi-Site Quality Assurance Project Plan Revision 2, September 4, 2007 (QAPP, 2007(c))
- Multi-Site Health and Safety Plan Revision 2, August 2, 2007 (HASP, 2007(a))
- Generalized Conceptual Site Model Revision 0, August 5, 2007 (CSM, 2007(b))
- Multi-Site Risk Assessment Framework Revision 0, September 5, 2007 (RAF, 2007(d))
- Multi-Site Field Sampling Plan Revision 4, September 8, 2008 (FSP, 2008(b))

Site-Specific Work Plans (SSWPs) are based on the Multi-Site documents and include modifications, as necessary, to reflect site-specific conditions. For instance, the site-specific CSM discusses the pathways presented in the Generalized CSM and why or why not the pathway is carried through into the baseline risk assessment.

2.2 Multi-Site FS Support Document

USEPA has approved (USEPA, 2010(c)) the Multi-Site FS Support Document dated March 26, 2010 (FS Support Document, 2010(c)) The Multi-Site FS Support Document includes general response actions



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•	inary remedial technologies for Integrys Energy Group's Illinois and Wisconsin-based companies under the USEPA's lead
SOW Secti	ion 1 2 2 discusses the Multi-Site FS Support Document which includes:
_	Preliminary Remedial Technology Screening
	Preliminary List of Possible Applicable or Relevant and Appropriate Requirements (ARARs)
	Preliminary Permitting/Equivalency Requirements
•	ic FS evaluations and the Detailed Analysis of Alternatives (FS Report) for each site are based ti-Site FS Support Document
2.3 M u	lti-Site Document Status
and to furth Addendum April 22, 20 the Region Protection provided co 2, IBS subi	the Regional Screening Levels (RSLs) into the hierarchy for human health screening levels her develop the approach to assessing potential vapor intrusion issues. Multi-Site RAF in, Revision 1, was submitted to USEPA on March 28, 2013. USEPA provided comments on 1013. It was mutually agreed that the revised document would be issued following revisions to real Screening Levels (RSLs) in June 2013 and to allow additional time for Illinois Environmental Agency (IEPA) to provide comments on the Multi-Site RAF Addendum Revision 1. IEPA comments to USEPA on July 1, 2013. Prior to developing Multi-Site RAF Addendum Revision mitted responses to Agency comments on August 12, 2013 and USEPA provided additional on August 26, 2013. Multi-Site RAF Addendum Revision 2 will be submitted in November
2.4 M u	Ilti-Site Meetings
_	reporting period, two multi-site technical meetings were conducted with USEPA, IBS, and NRT a specific technical issue
The first te	chnical meeting was held on August 27, 2013 to discuss the strategic schedule of the PGL,
	WD00 N0D + + + 1 C D + + C D0D) TI
NSG, and	WPSC MGPs to set goals for Records of Decisions (ROD). The second multi-site technical
meeting wa	as held on September 24, 2013 to discuss the objectives and highlights of the multi-site
meeting wa	, ,

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3 SITE PROGRESS

Project start dates and site prioritization for RI/FS activities were established in Exhibit A, Section A, of the Settlement Agreement (2008(c)). Project start dates were established for the North Branch Site – Division Street Station OU, South Branch Site – South Station Upland OU, North Shore Avenue Station Site, and Crawford Station Site Start dates for the remaining OUs were to be initiated every six months, or as otherwise mutually agreed upon

The priority of the sites has been modified from the sites identified in the SOW. At this time, the South Station Upland OU (South Branch Site), Division Street Station OU (North Branch Site), Willow Street-Hawthorne Avenue Station OU (In lieu of North Shore Avenue Site), North Station (North Branch Site), Crawford Station Site, Throop Street Station Upland OU (South Branch Site), Hough Place Station Upland OU (South Branch Site) have been initiated. The remaining sites have not been initiated. In addition to the RI/FS phase, a Time-Critical Removal Action has been initiated at the Crawford Station Site.

The North Branch Sites – Division Street Station OU, Willow Street-Hawthorne Avenue Station OU, and North Station OU were initiated on November 25, 2008, April 28, 2009, and June 15, 2011, respectively, with submittal of the Completion Reports. The South Branch Sites – South Station Upland OU and Throop Street Station Upland OU were initiated on May 13, 2008 and June 20, 2012, respectively, with submittal of the Completion Reports. The South Branch Sites – Hough Place Station Upland OU and Pitney Court Station Upland OU were initiated on March 15, 2013 and August 30, 2013, respectively, with submittal of the Completion Report with SSWP because remediation has been performed at these sites. The Crawford Station Site RI/FS was initiated on December 23, 2011 with submittal of the Completion Report. The AOC for a Time-Critical Removal Action for Crawford Station Site was signed on October 13, 2011. Progress on the Time-Critical Removal Action is discussed in weekly progress reports submitted to USEPA and is not included in this RI/FS AOC Annual Progress Report.

RI planning and field activities have been performed as summarized in the following sections during this reporting period. A removal action was contemplated at South Station Upland OU, but not initiated. As discussed above, Time-Critical Removal Actions have been performed at the Crawford Station during this reporting period.



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• .	provide a concise summary of the progress of the work
·	t of the progress report, the anticipated progress (as dule Update dated October 31, 2012 (2012(ai)) is compared
3.1 Overview Progress Meeti	ings
meetings were held on August 27, 2013 to d	luring this time period. As discussed in Section 2.4, multi-site discuss site schedules and on September 24, 2013 to discuss approach with the new Remedial Project Manager for the
3.2 South Station Upland OU	J (South Branch Site)
coincide with the effective date of the Settler Revision 0 was submitted on May 13, 2008	Upland OU was established in Exhibit A, Section A, to ment Agreement (2008(c)). However, Completion Report – (2008(a)), prior to finalizing the Settlement Agreement Per e calls may be used to discuss the content of South Station
boundaries of the South Station Upland OU.	odified the Settlement Agreement to modify the site The modification excluded Parcels C and D from the xisting data indicates the source removal has been complete anticipated on these parcels
• • • •	aplementing a removal action at the South Station Upland OU as decided the South Station Upland OU would not proceed trusion assessments should be performed.
3.2.1 Planning Documents and W	ork Plan Submittals
Planning documents and work plan submitte	als, related to the RI/FS AOC, were not prepared for the South
Station Upland OU during this reporting peri	iod because a removal action was contemplated, as
	ope of additional assessments Therefore, the Technical
Memorandum for additional assessments re	elated to vapor intrusion was not submitted
	atives Array Technical Memorandum, and FS Report -

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On May 9, 2013, USEPA provided comments on a data validation package On June 25, 2013, USEPA provided clarification that the comments were related to the April 2011 data validation package and on August 20, 2013, IBS provided a response to the comments.

3.2.2 Remedial Investigation Field Activities

RI field activities as described in the SSWP (2009(a)) were initiated in May 2009. Continued RI activities performed at the South Station Upland OU during this progress report period, are summarized in the following table.

Task .	Targeted Completion Date	Actual Completion Date
Twelfth Groundwater Monitoring Event (Fifth for wells installed in Sept. 2011)	January 2013	January 22-25, 2013
Thirteenth Groundwater Monitoring Event	April 2013	April 23-24, 2013
Fourteenth Groundwater Monitoring Event	July 2013	July 7-15, 2013
Fifteenth Groundwater Monitoring Event	October 2013	October 21-22, 2013

3.2.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8 1 of the SOW

Monthly Progress Report	Submittal Date
October 2012	November 13, 2012
November 2012	December 13, 2012
December 2012	January 15, 2013
January 2013	February 15, 2013
February 2013	March 14, 2013
March 2013	April 15, 2013
April 2013	May 14, 2013
May 2013	June 14, 2013
June 2013	July 15, 2013
July 2013	August 14, 2013
August 2013	September 16, 2013
September 2013	October 15, 2013



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				10/31/2013 3-Site Progress	
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	3.3 Division Street Station	OU (North B	ranch Site)		
	The Project Start Date for the Division St	treet Station OU wa	s established in Exhibit	A, Section A, to	
	coincide with the effective date of the Se	_			
	November 25, 2008 Per the SOW, scoping meetings and conference calls may be used to discuss the content of Division Street Station OU site-specific documents. No scoping meetings or conference calls				
	were held during this reporting period	•			
	3.3.1 Planning Documents and	l Work Plan Sul	nmittale		
	C				
	Planning documents and work plan subm	nittals are summaria	zed in the following table	9	
	Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received	
	Submit Step I Data Evaluation for North Branch Sediment Sampling		, , _ =		
	Technical Memorandum – Revision 1 (addressing USEPA's October 11,	November 2012	November 26, 2012	December 13, 2012	
	2012 comments)			-	
	Resubmit GEOS data		November 9, 2012	-	
	Submit Step I Data Evaluation for North Branch Sediment Sampling				
	Technical Memorandum – Revision 2 (addressing USEPA's December 13,	January 2013	February 20, 2013 ¹	March 6, 2013 (approved)	
	2012 comments)				
	Submit RI Report – Revision 0	June 25, 2013 ²	_2		
	Submit Alternatives Array Technical	August 26		_	
	Memo to USEPA	August 26, 2013 ²	2		
	1 Date was revised due to USEPA February 19, 2013	PA's request for additional data, data approved by USEPA on			
	 Submittal of RI Report – Revision sediment investigation would be 				
	was longer than anticipated.				
	1982 PGL 2013 ANNUAL PROGRESS RPT AND MASTER	SCHEDULE UPDATE 1310	31 DOC		
				NATURAL RESOURCE TECHNOLOGY	

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3.3.2 Remedial Investigation Field Activities

RI field activities were performed in accordance with USEPA-approved SSWP -- Revision 1 (2009(c)), and the USEPA-approved SSWP Addendum No 1 (2012(e)) Completed RI activities are summarized in the following table

Täsk	Targeted Completion Date	Actual Completion Date
Surface Water Sampling – Second Round	November 2012	November 12, 2012
Quarterly Groundwater Sampling Event	January 2013	January 14, 2013
Quarterly Groundwater and Seasonal Vapor Sampling Event	Aprıl/May 2013	April 29, 2013
Quarterly Groundwater Sampling Event	July 2013	July 17, 2013
Initiate Step II Sediment Sampling	February/March 2013 ¹	August 26-September 24, 2013
Quarterly Groundwater Sampling Event	October 2013	October 21, 2013

Target date of February/March 2013 assumed the permits would be obtained within 90 days of submitting application. Permits were submitted in early February 2013 and received August 9, 2013

3.3.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8 1 of the SOW

Monthly Progress Report	Submittal Date
October 2012	November 13, 2012
November 2012	December 13, 2012
December 2012	January 15, 2013
January 2013	February 15, 2013
February 2013	March 14, 2013
March 2013	April 15, 2013
April 2013	May 14, 2013
May 2013	June 14, 2013
June 2013	July 15, 2013
July 2013	August 14, 2013
August 2013	September 16, 2013
September 2013	October 15, 2013



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3.4 Willow Street - Hawthorne Avenue Station OU (North Branch Site)

The Project Start Date for the Willow Street – Hawthorne Avenue Station OU was not established in Exhibit A, Section A, of the Settlement Agreement (2008(c)) The start date was established as April 30, 2009 as summarized in the 2008 to 2009 Annual Progress Report (2009(e)) Per the SOW, scoping meetings and conference calls may be used to discuss the content of Willow Street – Hawthorne Avenue Station OU site-specific documents. No scoping meetings or conference calls were held during this reporting period.

3.4.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals are summarized in the following table

Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
Submit Step I Data Evaluation for North Branch Sediment Sampling Technical Memorandum – Revision 1 (addressing USEPA's October 11, 2012 comments)	November 2012	November 26, 2012	December 13, 2012
Resubmit GEOS data		November 9, 2012	-
Submit Step I Data Evaluation for North Branch Sediment Sampling Technical Memorandum – Revision 2 (addressing USEPA's December 13, 2012 comments)	January 2013	February 20, 2013 ¹	March 6, 2013 (approved)

1 Date was revised due to USEPA's request for additional data, data approved by USEPA on February 19, 2013



3.4.2 Remedial Investigation Field Activities

RI field activities were performed in accordance with USEPA-approved SSWP – Revision 2 (2011(d)) Completed RI activities are summarized in the following table.

Task	Targeted Completion Date	Actual Completion Date
Upland RI (soil borings, groundwater monitoring well and soil vapor probe installation, groundwater and soil vapor sampling)	November/December 2012	November 7 – December 21, 2012
Surface Water Sampling – Second Round	November 2012	November 12, 2012
Second Quarterly Groundwater Sampling Event	March 2013	March 18, 2013
Third Quarterly Groundwater Sampling Event	June 2013	June 18, 2013
Second Soil Gas Sampling Event	June 2013	July 17, 2013 ¹
Initiate Step II Sediment Sampling	October 2013	September 25, 2013
Fourth Quarterly Groundwater Sampling Event	October 2013	October 2-4, 2013

1 Completion of the second soil gas sampling event was postponed due to rain



	onthly Progress Reports		
Monthly Pro			
	ogress Reports have been submitted b	by the 15 th of each	month (or the following bu
•	nce with Section 8 1 of the SOW.	•	`
	Monthly Progress Report	Submittal Da	ite -
	October 2011	November 9,	
	November 2011	December 12	
	December 2011	January 11, 2	·
	January 2012	February 10,	
	February 2012	March 11, 20	-
	March 2012	April 10, 2012	2
	April 2012	May 10, 2012	<u> </u>
	May 2012	June 8, 2012	-
	June 2012	July 11, 2012	
	July 2012	August 10, 20)12
	August 2012	September 1	1, 2012
	September 2012	October 11, 2	2012
The Project Settlement 2010 Annu meetings a	rth Station OU (North Bra t Start Date for the North Station OU v Agreement (2008(c)) The start date v al Progress Report and Master Sched and conference calls may be used to do to the scoping meetings held are summer	was not established was established as lule Update (NRT, 2 iscuss the content	June 15, 2011 as summa 2010(n)) Per the SOW, so of North Station OU site-s
	Topic		Date
	<u> </u>		

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3.5.1 Planning Documents and Work Plan Submittals

No planning documents or work plans were submitted during this reporting period.

3.5.2 Remedial Investigation Field Activities

RI field activities were performed in accordance with USEPA-approved SSWP – Revision 1 (2012(p)) Completed RI activities are summarized in the following table

Ťásk	Targeted Completion Date	Actual Completion Date
Upland RI (soil borings, groundwater monitoring well and soil vapor probe installation, groundwater and soil vapor sampling on Division LLC and LaSalle Chestnut parcels)	March/April 2013	May 14 - October 2013 ¹
First Groundwater Sampling Event – Division LLC Parcel		July 2013
Second Groundwater Sampling Event – Division LLC Parcel and First Groundwater Sampling Event for remaining wells		September 13-23, 2013
Surface Water Sampling – First Round and sediment physical characterization	November 2012	November 12, 2012
Hydrographic Survey	December 2012	January 30-31, 2013
Initiate Step I Sediment Sampling	January/February 2013	2

- Access in the City Right-of-Way is restricted due to utilities. Access agreements are in process with ComEd and Old Town Village West.
- 2 Step I Sediment Sampling was assumed to be concurrent with Division Street Station and Willow Street-Hawthorne Avenue Station OU Step II Sampling. As discussed above the permit process delayed these events

3.5.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8 1 of the SOW



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Monthly Progress Report	Submittal Date	\neg
October 2011	November 9, 2011	
November 2011	December 12, 2011	

Monthly Progress Report	Submittal Date
October 2011	November 9, 2011
November 2011	December 12, 2011
December 2011	January 11, 2012
January 2012	February 10, 2012
February 2012	March 11, 2012
March 2012	April 10, 2012
April 2012	May 10, 2012
May 2012	June 8, 2012
June 2012	July 11, 2012
July 2012	August 10, 2012
August 2012	September 11, 2012
September 2012	October 11, 2012

3.6 Crawford Station

As previously discussed, PGL and USEPA entered into a Time-Critical AOC on October 13, 2011 to address portions of the site that had MGP residuals at the surface and were accessible for removal. The Time Critical Removal is proceeding under AOC V-W-11-C-981 and, therefore, is not summarized in detail in this report which addresses the RI/FS activities

The Project Start Date for the Crawford Station OU was not established in Exhibit A, Section A, of the RI/FS Settlement Agreement (October 31, 2008) The start date was established as December 16, 2011 as summarized in the 2011 Annual Progress Report and Master Schedule Update (2011(h)). Due to the size and multiple property owners at Crawford Station, the site will be subdivided into more manageable Parcel Groups in the SSWP. Parcel Groups will be mutually identified with USEPA and IBS and may be selected based on access, adjacent parcels, or other criterion. Parcel Groups will range in area. Per the SOW, scoping meetings and conference calls may be used to discuss the content of Crawford Station OU site-specific documents. The scoping meetings held are summarized in the following table.

Topic	Date
Site Access Issues, RI Schedule, USEPA Comments on SSWP Parcel Group II, and Removal Action on Parcel L	July 23, 2013



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3.6.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals are summarized in the following table

Task/Submittal	Targeted Completion Date	Actual Completion Date	USĒPA Comments Received
Submit Response to Comments to USEPA's September 4, 2012 Comments on Group I SSWP Revision 1	October 19, 2012	October 19, 2012	December 5, 2012 (approved)
Submit Group II SSWP Revision 0	March 15, 2013	Aprıl 5, 2013	July 11, 2013
Submit Response to Comments to USEPA's July 11, 2013 Comments on Group II SSWP Revision 0	September 6, 2013	September 6, 2013	t

3.6.2 Remedial Investigation Field Activities

Parcel Group II RI field investigation activities were targeted to be contracted in July and initiated in September 2013, assuming USEPA approval of the SSWP in July 2013. However, USEPA approval of the Parcel Group II SSWP is pending following IBS's submittal of a response to comments letter dated September 6, 2013 (2013(h)). A schedule for RI/FS field investigation activities will be established following USEPA's final approval of the Parcel Group II SSWP.

RI field activities were performed in Parcel Group I in accordance with USEPA-approved Group I SSWP – Revision 1 (2012(ag)). Completed RI activities are summarized in the following table.

Task	Targeted Completion Date	Actual Completion Date
Upland RI Parcel Group I – Parcels K, O, and P (soil borings and groundwater monitoring well installation)	March 2013 ¹	September 9, 2013

1 Assumed USEPA approval of Parcel Group I SSWP in November 2012

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3.6.3 M	onthly Progress Reports		3-Site Page	
Monthly Progress Reports have been submitted by the 15 th of each month (or the following business				
ın accorda	nce with Section 8 1 of the SOW			
	Morithly Progress Report	Submittal Date]	
	October 2012	November 9, 2012	1	
	November 2012	December 10, 2012	1	
	December 2012	January 10, 2013	1	
	January 2013	February 11, 2013	1	
	February 2013	March 11, 2013		
	March 2013	April 11, 2013		
	April 2013	May 10, 2013	-	
	May 2013	June 11, 2013	1	
	June 2013	July 11, 2013	1	
	July 2013	August 9, 2013]	
	August 2013	September 11, 2013]	
	September 2013	October 11, 2013]	
The Proje the RI/FS summariz scoping m	ct Start Date for the Throop Street State Settlement Agreement (2008(c)) The sed in the 2011 Annual Progress Report seetings and conference calls may be used to documents. No scoping meetings we period.	start date was established as June at and Master Schedule Update (201 used to discuss the content of Throc	20, 2012 as I1(h)). Per the op Street Stat	
reporting (



Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
Submit SSWP – Revision 0 and Response to USEPA's August 1, 2012 Completion Report Comments	October 29, 2012	October 15, 2012	December 4, 2012 (approved)

3.7.2 Remedial Investigation Field Activities

RI field activities were performed in accordance with USEPA-approved SSWP – Revision 0 (2012(af)) Completed RI activities are summarized in the following table

Task	Targeted Completion Date	Actual Completion Date
Initiate Upland RI (soil borings, groundwater monitoring well and soil vapor probe installation)	April 2013	October 22, 2013 ¹

Site access agreements to perform the upland RI activities were executed in September 2013, resulting in a delayed start date

3.7.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8 1 of the SOW

Monthly Progress Report	Submittal Date
October 2012	November 13, 2012
November 2012	December 13, 2012
December 2012	January 11, 2013
January 2013	February 13, 2013
February 2013	March 14, 2013
March 2013	April 1, 2013
April 2013	May 14, 2013
May 2013	June 14, 2013
June 2013	July 15, 2013
July 2013	August 14, 2013
August 2013	September 16, 2013
September 2013	October 15, 2013



		ogress Report and Ma	Rev 10/3 3-Site Pr Page 1
The Project Start Date for the Hough Place RI/FS Settlement Agreement (2008(c)) The summarized in the 2012 Annual Progress Facoping meetings and conference calls maste-specific documents. The scoping meet	Station OU was no e start date was est Report and Master S y be used to discus	t established in Exhibablished as February Schedule Update (20) s the content of Houg	15, 2013 as 12(aı)). Per the S h Place Station
Topic			ete:
Pre-Scoping Completion Report with SSV	VP Scoping Meeting	January	, 17, 2013
Discuss Draft Responses to USEPA Comments for Completion Report with SSWP – Revision 1		Septemb	er 24, 2013
3.8.1 Planning Documents and V			e
3.8.1 Planning Documents and V Planning documents and work plan submit Task/Submittal	tals are summarized Targeted Completion		USEPA Comi
Planning documents and work plan submit	tals are summarized	d in the following table Actual	USEPA Comr Received June 3, 20
Planning documents and work plan submit Task/Submittal Submit Completion Report with SSWP	Targeted Completion Date February 15,	Actual Completion Date	USEPA Comi Receive
Planning documents and work plan submit Task/Submittal Submit Completion Report with SSWP Revision 0 Submit Response to USEPA's June 3, 2013 Comments on Completion Report with SSWP — Revision 0 and Submit Completion Report with SSWP —	Targeted Completion Date February 15, 2013	Actual Completion Date March 15, 2013 ¹	USEPA Comi Received June 3, 20

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3.8.1 Remedial Investigation Field Activities

No remedial investigation field activities were performed during this reporting period

3.8.2 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8 1 of the SOW

Monthly Progress Report	Submittal Date
March 2013	April 1, 2013
Aprıl 2013	May 14, 2013
May 2013	June 14, 2013
June 2013	July 15, 2013
July 2013	August 14, 2013
August 2013	September 16, 2013
September 2013	October 15, 2013

3.9 Pitney Court Station (South Branch Site)

The Project Start Date for the Throop Street Station OU was not established in Exhibit A, Section A, of the RI/FS Settlement Agreement (2008(c)) The start date was established as January 10, 2014 as summarized in the 2012 Annual Progress Report and Master Schedule Update (2012(ai)) However, the Pitney Court Station was initiated in lieu of the North Shore Avenue Station. The North Shore Avenue Station start date was established as July 12, 2013. The Pitney Court Station start date was delayed to August 30, 2013 to allow USEPA additional time to comment on the format of the Hough Place Station OU, which was the first site to proceed with a combined Completion Report with SSWP.

Per the SOW, scoping meetings and conference calls may be used to discuss the content of Pitney Court Station site-specific documents. The scoping meetings held are summarized in the following table.

Topic	Date
Site Overview and Multi-Site Approach Meeting	September 24, 2013

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Planning docum Ta Submit Comple Revision 0 3.9.2 Month	ents and work plan submit sk/Submittal etion Report with SSWP	Target Comple Date	mmanzed eted ëtion		USEPA Comm Received
Submit Complete - Revision 0 3.9.2 Month	etion Report with SSWP	Comple Date August 30	ëtion :e	Completion Date	
Revision 0	ly Progress Reports		0, 2013	August 30, 2013	
Monthly Progres					
L	September 2013		October	15, 2013	_
3.10Remai	ning PGL Sites				
As discussed at	pove, a project start date w	vas establish	hed in the	e 2012 Annual Progre	ess Report and M
	e Report (2012(aı)) for the ated ın lieu of North Shore	•		•	-
Additional proje	ct start dates for the remai	ning sites we	ere not e	established in the 201	12 Annual Progre
-	ter Schedule Update Repo ore Avenue, 22 nd Street Sta			-	

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4 PROPOSED MASTER SCHEDULE

Exhibit A of the SOW includes a schedule for major deliverables. The South Station Upland OU, Division Street Station OU, Willow Street – Hawthorne Avenue Station OU, and North Station OU, Crawford Station, Throop Station OU, and Pitney Court Station have been initiated

Future submittals and/or activities are dependent on USEPA comments and approvals. The site-specific schedules presented in the SSWPs or supplemental RI activities, are updated herein to provide proposed site-specific schedules for field activities and major deliverables. A proposed schedule North Shore Avenue Station, 22nd Street Station OU and South Branch River OU is presented herein for major deliverables. As discussed in Section 3.10, Project Start Dates for remaining PGL sites are to be established

4.1 Overview Progress Meetings

Overview progress meetings are proposed to be conducted on an as-needed basis at the request of either USEPA or IBS. Specific progress meeting dates are not proposed at this time

4.2 Multi-Site RI Documents

The Multi-Site Documents, as described in the SOW, have been completed and approved as summarized in Section 2. Additional Multi-Site Documents are not anticipated at this time. Addendums to the multi-site documents may be issued, as appropriate, to update programmatic procedures or approaches.

4.3 Schedule for PGL Sites

Figure 1 summarizes the proposed target dates for RI/FS activities at each of the sites. The proposed target dates are generally consistent with the schedules provided in the SSWPs, adjusted to reflect current status, USEPA approvals and reasonably anticipated approvals. All site schedules are dependent on USEPA approval dates, contractor availability, and sampling seasons (particularly with respect to sediment sampling activities).

Figure 1 considers the deliverable timeframes specified in Exhibit A of the SOW (e.g., SSWPs submitted 90 days following the Completion Report submittal, finalize submittals within 45 days from receipt of



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		s assumed USEPA will provide comments within 60	
	days of submittals for Revision 0 and provide appro-	vals within 45 days of receiving Revision 1.	
	The proposed schedules are subject to change Mod	-	
	communicated to USEPA through monthly site-spec calls during RI activities, or other communications	ific progress reports, weekly progress conference	
	•	Propob Sito	
Ö	4.3.1 South Station Upland OU (South E The tasks provided in the South Station Upland OU	•	
	(2009(a)), have been completed up to submittal of the	•	
	Supplemental RI field activities are anticipated to ad	dress potential vapor intrusion. These tasks and on-	
	going post RI groundwater monitoring are presented	d in Figure 1 and summarized in the following table	
	Task/Deliverable	Target Date for Completion	
	Monthly Progress Reports	15 th of every month	
	Submit Supplemental RI Technical Memorandum		
	Vapor Intrusion, Revision 0 (assumes groundwater plume is fully defined)	November 15, 2013	
	(assumes groundwater plante is fully defined)		
	Supplemental RI Field Activities (assumes USEPA approval of Supplemental RI	Install Soil Gas Probes – January 2014	
	Technical Memorandum – Vapor Intrusion, Revision 0 by mid December 2013)	Soil Gas Sampling Event 1 – January 2014	
	Submit RI Report – Revision 0 to USEPA	Soil Gas Sampling Event 2 – July 2014	
	(assumes no additional RI activities are identified)	October 20, 2014	
	Alternatives Array Tech Memo to USEPA	December 19, 2014	
	FS Report – Revision 0 to USEPA (assumes USEPA comments on Alternatives Array Tech Memo early February 2015)	April 3, 2015	
	On-going Post RI Groundwater Monitoring	To be determined following review of RI Data	
	on going root to crowned the monitoring	Preliminarily proposed as semi-annual	
	4.3.2 Division Street OU (North Branch	Site)	
	The tasks provided in the Division Street OU SSWF	P – Revision 1, dated September 21, 2009 (2009(f)).	
	•	The tasks provided in the Division Street OU SSWP – Revision 1, dated September 21, 2009 (2009(f)), the Step I Data Evaluation for North Branch Sediment Sampling Technical Memorandum, (2012(ac)) and	
	supplemental RI field activities have been complete	d in the upland area, Step I Sediment Sampling and a	
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portion of Step II Sediment Sampling The need for additional supplemental RI field activities will be evaluated following review of RI data (soil sampling, additional groundwater monitoring wells, and soil vapor probes)

Major deliverable target dates are presented on Figure 1 and summarized in the following table

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month
Supplemental RI Field Activities - Upland	None anticipated
RI Field Activities - Sediment adjacent to Division Street OU	December 2013
Submit RI Report – Revision 0 to USEPA	June 13, 2014
Alternatives Array Tech Memo to USEPA	August 12, 2014
Submit FS Report – Revision 0 to USEPA (assumes USEPA comments on Alternatives Array Tech Memo mid October 2014)	November 27, 2014
On-going Post RI Groundwater Monitoring	To be determined following review of RI Data Preliminantly proposed quarterly

4.3.3 Willow Street – Hawthorne Avenue Station OU (North Branch Site)

The Willow Street – Hawthorne Avenue Station OU SSWP – Revision 2 was submitted to USEPA on July 15, 2011 (2011(d)) and conditionally approved on August 30, 2011. The tasks provided in the Willow Street – Hawthorne Avenue Station OU SSWP – Revision 2 (2011(d)) and the Step I Data Evaluation for North Branch Sediment Sampling Technical Memorandum, (2012(ac)), related to the upland areas, Step I Sediment Sampling and a portion of Step II Sediment Sampling have been completed



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Major deliverable target dates are presented on F	igure 1 and summarized in the following table
Tāšk/Dēliverāble	Target Date for Completion
Monthly Progress Reports	15 th of every month
Supplemental RI Field Activities – Upland	None anticipated
RI Field Activities - Sediment adjacent to Willow Street-Hawthorne Avenue Station OU	December 2014
Submit RI Report - Revision 0 to USEPA	June 13, 2014
Alternatives Array Tech Memo to USEPA	August 12, 2014
Submit FS Report – Revision 0 to USEPA	
(assumes USEPA comments on Alternatives Array in mid October 2014)	November 27, 2014
On-going Post RI Groundwater Monitoring	To be determined following review of RI Data
1.3.4 North Station OU (North Branch	Site
·	·
The North Station OU SSWP - Revision 1 was su	
approved by USEPA on March 20, 2012 (2012(h) submitted on June 25, 2012 (2012(p)) Major deliv	
summarized in the following table	
Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month
RI Field Activities - Upland	Continued Soil Boring Installation/Sampling -
(assumes access agreements are in place December 2013)	2014 Continued Groundwater Monitoring Well Insta
	January 2014
	Continued Soil Gas Probe Installation – Janua
	Quarterly RI Groundwater Monitoring –throug September 2014)
RI Field Activities - Sediment adjacent to North Station OU	Step I Sediment Sampling (as discussed in th – December 2013
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Task/Deliverable	Target Date for Completion
	Step II Sediment Sampling (as discussed in the RAF) – if necessary, July 2014
	(assumes scope is defined June 2014)
Submit RI Report – Revision 0 to USEPA	January 26, 2015
Alternatives Array Tech Memo to USEPA	March 27, 2015
Submit FS Report – Revision 0 to USEPA	July 10, 2015
(assumes USEPA comments on Alternatives Array in May 2015)	
On-going Post RI Groundwater Monitoring	To be determined following review of RI Data

4.3.5 Crawford Station

The project start date for Crawford Station was established as December 15, 2011 A Completion Report (2011(I)) for the entire Crawford Station site has been prepared and submitted to USEPA. Due to the size and multiple property owners at Crawford Station, a phased approach to the RI/FS activities has been proposed and approved by USEPA Accordingly, the initial SSWP has been prepared to reflect four groups of parcels that will be investigated in a sequential manner during the RI/FS. The Parcel Group 1 SSWP – Revision 1 (2012(ag)) has been submitted and initiated. The Parcel Group 2 SSWP is currently being reviewed by USEPA and final approval is pending. Site specific work plans addressing each of the other parcel groups (Groups III through IV) will be submitted as addenda to the SSWP.

Proposed target dates for future RI/FS activities, are provided as general placeholders for planning purposes only and may be significantly different, depending on USEPA approvals

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month starting in January 2012
RI Field Activities – Upland Parcel Group 1	Continued Soil Boring Installation/Sampling – November 2013
	Continued Groundwater Monitoring Well Installation – December 2013
	Continued Soil Gas Probe Installation – December 2013
	Quarterly RI Groundwater Monitoring – through October 2014)



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	Task/Deliverable	Target Date for Completion
	Submit Parcel Group 1 RI Report – Revision 0 to USEPA	January 4, 2015
_	Parcel Group 1 Alternatives Array Tech Memo to USEPA	March 5, 2015
	Submit Parcel Group 1 FS Report – Revision 0 to USEPA	June 18, 2015
	(assumes USEPA comments on Alternatives Array in May 2015)	
	Submit Parcel Group 2 SSWP Addendum – Revision 1 to USEPA	February 3, 2014
	(assumes USEPA comments on Parcel Group 2 SSWP Addendum Revision 0 early December 2013)	
	Initiate Parcel Group 2 RI Field Work	May 2014
	Submit Parcel Group 3 RI Report – Revision 0 to USEPA	August 14, 2014
	4.3.6 Throop Station OU (South Bran	ch Site)
	The project start date for the Throop Station OU (South Branch Site) was established as June 20, 2012 A	
		SSWP – Revision 0, submitted October 15, 2012 On December 4, 2012 Access negotiations have been
	resolved and the RI field investigation activities w	
	Major deliverable target dates are presented on F	Figure 1 and summarized in the following table.
		1
	Task/Deliverable	Target Date for Completion
	Monthly Progress Reports	15 th of every month
	Initiate RI Field Work	October-November 2013 – soil borings, groundwater monitoring well and soil gas probe installation
		Quarterly RI Groundwater Monitoring – through August 2014)
	Submit RI Report – Revision 0 to USEPA	December 5, 2014
	(assumes supplemental RI activities are not required)	
	required)	
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Task/Deliverable	Target Date for Completion
Alternatives Array Tech Memo to USEPA	February 3, 2015
Submit FS Report – Revision 0 to USEPA	May 21, 2015
(assumes USEPA comments on Alternatives Array in April 2015)	
On-going Post RI Groundwater Monitoring	To be determined following review of RI Data
On-going Fost At Groundwater Monitoring	To be determined following review of Rt Data

4.3.7 Hough Place Station OU (South Branch Site)

The project start date for the Hough Place Station OU (South Branch Site) was established as March 15, 2013. The Completion Report with SSWP – Revision 1 was approved by USEPA on October 30, 2013.

Major deliverable target dates are presented on Figure 1 and summarized in the following table

Täsk/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month
Initiate RI Field Work (site access agreements assumed final in December 2013)	March 2014 – soil borings, groundwater monitoring well and soil gas probe installation Quarterly RI Groundwater Monitoring – through January 2015)
Submit RI Report – Revision 0 to USEPA	April 20, 2015
(assumes supplemental RI activities are not required)	
Alternatives Array Tech Memo to USEPA	June 19, 2015
Submit FS Report – Revision 0 to USEPA	October 2, 2015
(assumes USEPA comments on Alternatives Array in August 2015)	
On-going Post RI Groundwater Monitoring	To be determined following review of RI Data

4.3.8 Pitney Court Station (South Branch Site)

The project start date for the Pitney Court Station OU (South Branch Site) was established as August 30, 2013. The Completion Report with SSWP – Revision 0 was submitted August 30, 2013 and is currently under USEPA review



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Major deliverable target dates are presented on	Figure 1 and summarized in the following table
•	eport with SSWP – Revision 0 by November 27, 2
Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month
Initiate RI Field Work (to be provided in SSWP, USEPA approval assumed by November 27,	April-May 2014 – soil borings, groundwater mo well and soil gas probe installation
2013)	Quarterly RI Groundwater Monitoring – through February 2015)
Submit RI Report - Revision 0 to USEPA	June 1, 2015
(assumes supplemental RI activities are not required)	
Alternatives Array Tech Memo to USEPA	July 31, 2015
Submit FS Report – Revision 0 to USEPA	November 13, 2015
(assumes USEPA comments on Alternatives Array in September 2015)	
On-going Post RI Groundwater Monitoring	To be determined following review of RI Data
Proposed target dates, after submittal of the Cor	OU (South Branch Site) is proposed as March 17 inpletion Report (summarized below), are provided and may be significantly different, depending on
Task/Deliverable	Target Date for Completion
	15 th of every month starting in May 2014
Monthly Progress Reports	
	March 17, 2014
Monthly Progress Reports Submit Completion Report – Revision 0 to	March 17, 2014 June 16, 2014
Monthly Progress Reports Submit Completion Report – Revision 0 to USEPA (Project Start Date)	<u> </u>
Monthly Progress Reports Submit Completion Report – Revision 0 to USEPA (Project Start Date) Submit SSWP – Revision 0 to USEPA	June 16, 2014

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4.3.10 North Shore Avenue Station

The project start date for the North Shore Avenue Station is proposed as June 19, 2014 Proposed target dates, after submittal of the Completion Report (summarized below), are provided as general placeholders for planning purposes only and may be significantly different, depending on USEPA approvals and the expedited process identified

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month starting in August 2014
Pre-Scoping Meeting with USEPA	March 21, 2014
Submit Completion Report/SSWP – Revision 0 to USEPA (Project Start Date)	June 19, 2014
Initiate RI Field Work (to be provided in SSWP, USEPA approval assumed in November 2014)	January 2015

4.3.1 South Branch River OU

The project start date for the South Branch River OU is proposed December 18, 2014. Proposed target dates, after submittal of the Completion Report (summarized below), are provided as general placeholders for planning purposes only and may be significantly different, depending on USEPA approvals and the expedited process identified

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month starting in February 2015
Submit Completion Report/ Assessment – Revision 0 to USEPA (Project Start Date)	December 18, 2014
Initiate RI Field Work (to be provided in SSWP, USEPA approval assumed in August 2015)	August 2015 – permitting October 2015 – initiate field activities



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2007(a)	August 2, 2007 Revision 2, Multi-Site Health and Safety Plan, for Former Manufactured Ga Plant Sites, prepared for Integrys.
2007(b)	August 5, 2007 Revision 0, Generalized Conceptual Site Model, for Former Manufactured Plant Sites, prepared for Integrys
2007(c)	September 4, 2007 Revision 2, Multi-Site Quality Assurance Project Plan, for Former Manufactured Gas Plant Sites, prepared for Integrys
2007(d)	September 5, 2007 Revision 2, Exponent, Multi-Site Risk Assessment Framework, for Form Manufactured Gas Plant Sites
2008(a)	May 13, 2008, Burns and McDonnell, Completion Report, South Station Upland Operable U Chicago, Illinois.
2008(b)	September 8, 2008. Revision 4, Multi-Site Field Sampling Plan, for Former Manufactured G Plant Sites.
2008(c)	October 31, 2008. United States Environmental Protection Agency and Peoples Gas Light a Coke Company, Settlement Agreement and Administrative Order on Consent for Remedial Investigations and Feasibility Studies at Four Peoples Gas MGP Sites in Chicago, Illinois LEPA Region 5, CERCLA Docket No V-W-08-C-917
2009(a)	January 26, 2009. Burns and McDonnell, Site-Specific Work Plan, Revision 1, South Statio Upland Operable Unit, Chicago, Illinois
2009(b)	July 16, 2009. Revision 0 Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrys
2009(c)	September 21, 2009. Burns and McDonnell, Site-Specific Work Plan, Revision 0, Willow St Hawthorne Avenue Station Operable Unit, Chicago, Illinois
2009(d)	October 6, 2010. United States Environmental Protection Agency Email Regarding Hold or Scoping Meetings/Delaying Throop Street Station Start Date.
2009(e)	November 2, 2009. Burns and McDonnell, 2008 to 2009 Annual Progress Report, South Br Site and North Branch Site, Chicago, Illinois, The Peoples Light, Gas and Coke Company.
	September 21, 2009 Burns and McDonnell, Site-Specific Work Plan, Revision 1, Division S

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- 2010(a) March 17, 2010 United States Environmental Protection Agency. Comments on Revision 0 Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrys.
- 2010(b) March 24, 2010 United States Environmental Protection Agency. Email Regarding Revised Schedule Request South Station Approval.
- 20010(c) March 26, 2010 Revision 1 Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrys
- 2010(d) April 20, 2010. United States Environmental Protection Agency Approval of Revision 1 Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrys.
- 2010(e) June 3, 2010. United States Environmental Protection Agency Comments on Site-Specific Work Plan, Willow Street Hawthorne Avenue Station Operable Unit, Chicago, Illinois
- 2010(f) July 6, 2010. Natural Resource Technology, Inc. Response to USEPA Comments dated June 3, 2010 on Site-Specific Work Plan, Willow Street Hawthorne Avenue Station Operable Unit, Chicago, Illinois
- 2010(g) July 8, 2010. Natural Resource Technology, Inc. Technical Memorandum for Supplemental RI Field Work Vapor Intrusion, Revision 0, South Station Operable Unit, Chicago, Illinois
- 2010(h) August 19, 2010 United States Environmental Protection Agency Additional Comments on Site-Specific Work Plan, Revision 0, Willow Street – Hawthorne Avenue Station Operable Unit, Chicago, Illinois
- 2010(i) July 8, 2010 United States Environmental Protection Agency. Comments on Technical Memorandum for Supplemental RI Field Work Vapor Intrusion, Revision 0, South Station Operable Unit, Chicago, Illinois
- 2010(j) September 20, 2010 Natural Resource Technology, Inc. Response to USEPA Additional Comments dated August 19, 2010 on Site-Specific Work Plan, Revision 0, Willow Street Hawthorne Avenue Station Operable Unit, Chicago, Illinois.
- 2010(k) September 27, 2010 Natural Resource Technology, Inc. Supplement to Characterization of Ambient Conditions in the Chicago River Upstream of the North Branch MGP Sites Technical Memorandum (rev. 9/27/10), Chicago, Illinois, Peoples Gas and Light Company CERCLA Docket No. V-W-'08-C-917
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2010 (n) October 28, 2010, Natural Resource Technology, Inc. 2010 Annual Progress Report and Ma Schedule Update, Remedial Investigation/Feasibility Study, Peoples Gas Light and Coke Company, Former Manufactured Gas Plant Sites, CERCLA V-W-08-C-917, Revision 0.	aster
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2010(p) December 23, 2010. Natural Resource Technology, Inc. Response to USEPA's Additional Comments (dated November 9, 2010) Technical Memorandum for Supplemental RI Field Wo Vapor Intrusion, Revision 0, South Station Operable Unit, Chicago, Illinois.	ork –
2010(q) January 21, 2011 United States Environmental Protection Agency Additional Comments on Technical Memorandum for Supplemental RI Field Work – Vapor Intrusion, Revision 0, South Station Operable Unit, Chicago, Illinois	ı the h
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2011(a) April 18, 2011 Natural Resource Technology, Inc. Site-Specific Work Plan, Willow Street/Hawthorne Avenue Station Operable Unit, Revision 1, Chicago, Illinois	
2011(b) April 20, 2011. Exponent, Multi-Site Risk Assessment Framework Addendum, Former Manufactured Gas Plant Sites, North Shore Gas Company CERCLA Docket No. V-W-07-C-8 Peoples Gas Light and Coke Co. CERCLA Docket No. V-W-08-C-917, Wisconsin Public Ser Corporation CERCLA Docket No. V-W-06-C-847	
2011(c) June 15, 2011 Natural Resource Technology, Inc Completion Report, North Station Operab Unit, Revision 0, Chicago, Illinois	ole
2011(d) July 15, 2011. Natural Resource Technology, Inc. Site-Specific Work Plan, Willow Street/Hawthorne Avenue Station Operable Unit, Revision 2, Chicago, Illinois.	
2011(e) August 31, 2011. Natural Resource Technology, Inc. Site-Specific Work Plan, North Station Operable Unit, Revision 0, Chicago, Illinois	
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2011 (g) October 13, 2011 United States Environmental Protection Agency and Peoples Gas Light a Coke Company, Settlement Agreement and Administrative Order on Consent for Removal Ac at Crawford Station MGP Sites in Chicago, Illinois US. EPA Region 5, CERCLA Docket No. W-11-C-981	ction
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- 2011(i) November 2, 2011 United States Environmental Protection Agency Comments on Preliminary RI Results for Division Street Station OU
- 2011(j) November 28, 2011 Natural Resource Technology, Inc Site-Specific Work Plan, North Station Operable Unit, Revision 1, Chicago, Illinois
- 2011 (k) December 19, 2011 Natural Resource Technology, Inc. Response to USEPA's Comments on Preliminary RI Results for Division Street Station OU Chicago, Illinois
- 2011 (I) December 23, 2011 Natural Resource Technology, Inc. Completion Report Revision 0, Crawford Station. Chicago, Illinois
- 2012(a) January 26, 2012. United States Environmental Protection Agency Additional Comments on Preliminary RI Results for Division Street Station OU
- 2012(b) January 26, 2012 United States Environmental Protection Agency Comments on Site-Specific Work Plan, North Station Operable Unit, Revision 1, Chicago, Illinois
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- 2012 (d)March 12, 2012 Natural Resource Technology, Inc. Response to USEPA's Additional Comments (dated January 26, 2012) on Preliminary RI Results for Division Street Station OU. Chicago, Illinois.
- 2012 (e) March 12, 2012 Natural Resource Technology, Inc. Site-Specific Work Plan Addendum No. 1 Revision 0 for Upland Areas, Division Street Station OU. Chicago, Illinois
- 2012(f) March 12, 2012 Natural Resource Technology, Inc. Response to USEPA Comments on Site-Specific Work Plan, North Station Operable Unit, Revision 1, Chicago, Illinois
- 2012 (g) March 14, 2012 Natural Resource Technology, Inc Parcel Group 1 Site-Specific Work Plan Revision 0, Crawford Station Chicago, Illinois
- 2012(h) March 20, 2012 United States Environmental Protection Agency Approval of Site-Specific Work Plan, North Station Operable Unit, Revision 1, Chicago, Illinois
- 2012 (i) March 21, 2012 United States Environmental Protection Agency Comments on Site-Specific Work Plan Addendum No 1 Revision 0 for Upland Areas, Division Street Station OU Chicago, Illinois
- 2012 (j) April 3, 2012 Natural Resource Technology, Inc. Response to USEPA Comments on Parcel Group 1 Completion Report Revision 0, Crawford Station. Chicago, Illinois
- 2012 (k) May 7, 2012 Natural Resource Technology, Inc. Response to USEPA Comments on Site-Specific Work Plan Addendum No. 1 – Revision 0 for Upland Areas, Division Street Station OU Chicago, Illinois



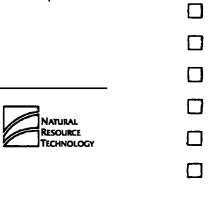
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2012 (I) May 10, 2012 United States Environmental Protection A Specific Work Plan Addendum No 1 – Revision 0 for Uj Chicago, Illinois	
2012 (m) May 22, 2012 United States Environmental Protection Site-Specific Work Plan - Revision 0, Crawford Station	
2012 (n) June 20, 2012 Natural Resource Technology, Inc. Com Street Station Upland OU. Chicago, Illinois.	npletion Report - Revision 0, Throop
2012 (o) June 25, 2012 Natural Resource Technology, Inc. Lette – Revision 2 Regarding Sampling Parameters, Willow S Chicago, Illinois	
2012 (p) June 25, 2012 Natural Resource Technology, Inc. Lette – Revision 1 Regarding Sampling Parameters, North St	
2012 (q) July 10, 2012 United States Environmental Protection of Update to Site-Specific Work Plan – Revision 2 Regardi Hawthorne Avenue Station OU Chicago, Illinois	
2012 (r) July 10, 2012 United States Environmental Protection A Update to Site-Specific Work Plan – Revision 2 Regard OU Chicago, Illinois	Agency Acknowledgement of Letter aring Sampling Parameters, North Station
2012 (s) August 1, 2012 United States Environmental Protection Report - Revision 0, Throop Street Station Upland OU	
2012 (t) August 3, 2012 Natural Resource Technology, Inc. Res Group 1 Site-Specific Work Plan - Revision 1, Crawford	
2012 (u) August 3, 2012 Natural Resource Technology, Inc. Par Revision 1, Crawford Station Chicago, Illinois	rcel Group 1 Site-Specific Work Plan
2012 (v) September 4, 2012 United States Environmental Prote Upland Data Submittal to GEOS, Division Street Station	
2012 (w) September 4, 2012 United States Environmental Prote USEPA Comments of Parcel Group 1 Site-Specific Wo Work Plan – Revision 1, Crawford Station Chicago, Illir	ork Plan - Revision 0 and Site-Specific
2012 (x) September 5, 2012 Natural Resource Technology, Inc. Specific Work Plan – Revision 2, Willow Street-Hawthor	
2012 (y) September 13, 2012 United States Environmental Prot Vapor Intrusion Update to Site -Specific Work Plan – Re Avenue Station OU. Chicago, Illinois	

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2012 (ad) October 11, 2012 United States Environmental Protection Agency Comments on Division Sediment Data Submittal to GEOS, Division Street Station OU. Chicago, Illinois
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2013 (b) March 6, 2013 United States Environmental Protection Agency Approval on Step I Data Evaluation for North Branch Sediment Sampling Technical Memorandum, North Branch Sediment Protection 2 (Division Street Station OU, Willow Street-Hawthorne Avenue Station OU, and Station OU). Chicago, Illinois.
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2013 (f) July 11, 2013 United States Environmental Protection Agency Comments on Parcel Group Site-Specific Work Plan - Revision 0, Crawford Station Chicago, Illinois
2013 (g) July 17, 2013 Natural Resource Technology, Inc. Response to USEPA Comments on Completion Report with Site-Specific Work Plan – Revision 0 and Submit Completion Repo SSWP – Revision 1, Hough Place Station Operable Unit, Chicago, Illinois
2013 (h) September 6, 2013 Natural Resource Technology, Inc. Response to USEPA's Comments Parcel Group II Site-Specific Work Plan - Revision 0, Crawford Station. Chicago, Illinois
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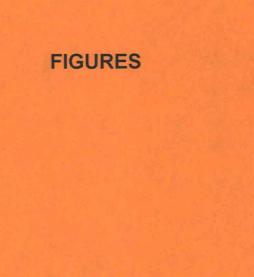
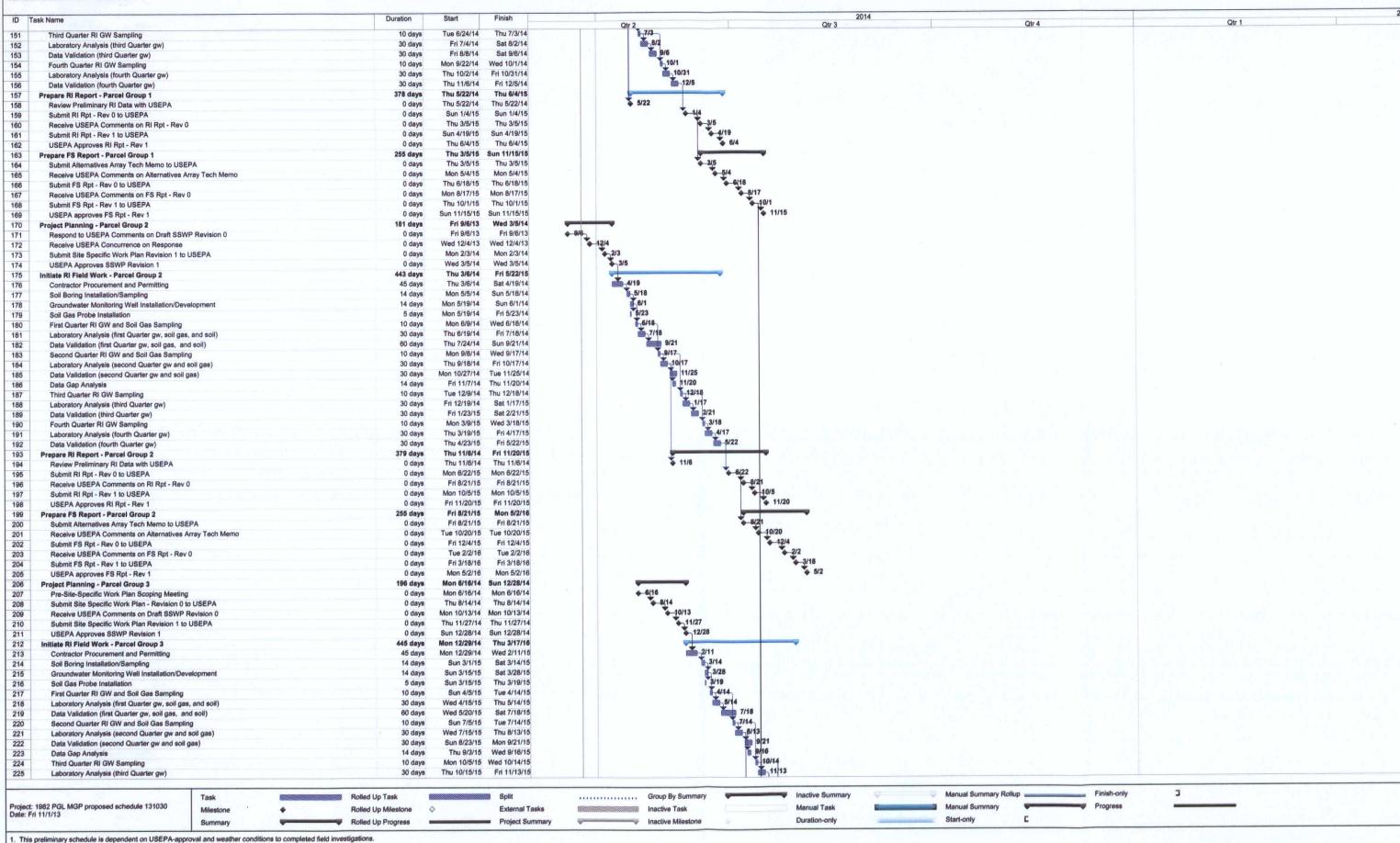
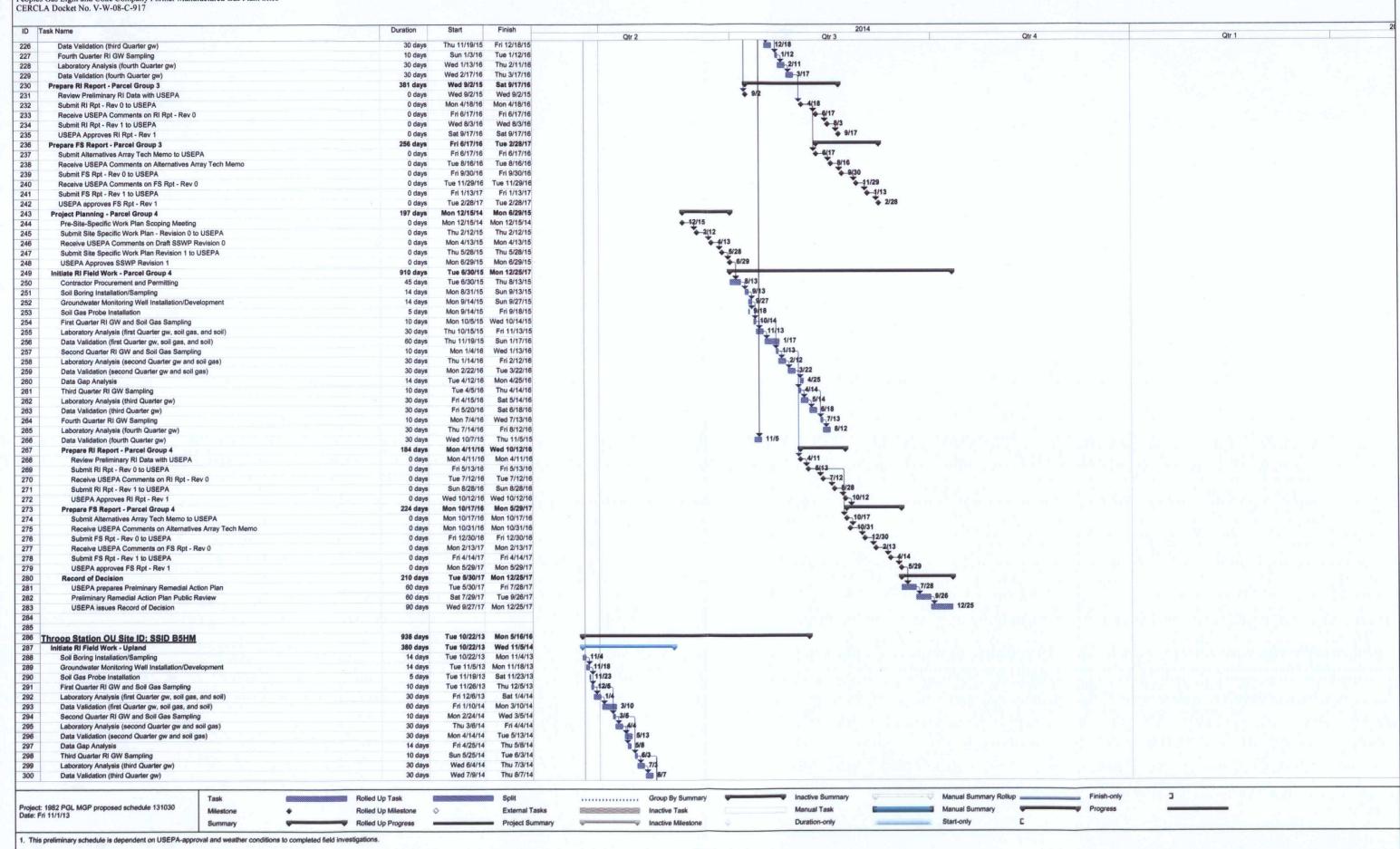


FIGURE 1
2013 Master Schedule Update - Revision 0
Peoples Gas Light and Coke Company Former Manufactured Gas Plant Sites
CERCLA Docket No. V-W-08-C-917

ID Task Name

151 Third Quarter RI GW Sampling
152 Laboratory Analysis (third Quarter gw)
153 Data Validation (third Quarter gw)





Peoples Gas Light and Coke Company Former Manufactured Gas Plant Sites CERCLA Docket No. V-W-08-C-917 12/1
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1 ID Task Name Duration Finish Qtr 3 Qtr 1 Qtr 2 45 days Sat 10/18/14 Mon 12/1/14 376 Contractor Procurement and Permitting Wed 12/17/14 Tue 12/30/14 Soil Boring Installation/Sampling 14 days 377 Wed 12/31/14 Tue 1/13/15 14 days 378 Groundwater Monitoring Well Installation/Development Sun 1/18/15 379 Soil Gas Probe Installation 5 days Wed 1/14/15 380 First Quarter RI GW and Soil Gas Sampling 10 days Wed 1/21/15 Fri 1/30/15 381 Laboratory Analysis (first Quarter gw, soil gas, and soil) 30 days Sat 1/31/15 Sun 3/1/15 Data Validation (first Quarter gw, soil gas, and soil) 60 days Sat 3/7/15 Tue 5/5/15 Second Quarter RI GW and Soil Gas Sampling 383 10 days Tue 4/21/15 Thu 4/30/15 Laboratory Analysis (second Quarter gw and soil gas) 30 days Fri 5/1/15 Sat 5/30/15 Tue 6/9/15 Wed 7/8/15 385 Data Validation (second Quarter gw and soil gas) 30 days 386 Data Gap Analysis 14 days Sat 6/20/15 Fri 7/3/15 Third Quarter RI GW Sampling 10 days Mon 7/20/15 Wed 7/29/15 387 Thu 7/30/15 Fri 8/28/15 30 days 388 Laboratory Analysis (third Quarter gw) Fri 10/2/15 Thu 9/3/15 30 days 389 Data Validation (third Quarter gw) Sun 10/18/15 Tue 10/27/15 390 Fourth Quarter RI GW Sampling 10 days Laboratory Analysis (fourth Quarter gw) 30 days Wed 10/28/15 Thu 11/26/15 392 Data Validation (fourth Quarter gw) 30 days Wed 12/2/15 Thu 12/31/15 232 days Tue 11/10/15 Wed 6/29/16 Prepare RI Report 394 Review Preliminary RI Data with USEPA 0 days Tue 11/10/15 Tue 11/10/15 Sat 1/30/16 Sat 1/30/16 395 Submit RI Rpt - Rev 0 to USEPA 0 days 396 Receive USEPA Comments on RI Rpt - Rev 0 0 days Wed 3/30/16 Wed 3/30/16 Thu 4/14/16 397 Review Response to USEPA Comments on RI Rpt - Rev 0 with USEPA 0 days Thu 4/14/16 Submit RI Rot - Rev 1 to USEPA 0 days Sat 5/14/16 Sat 5/14/16 398 Wed 6/29/16 Wed 6/29/16 399 USEPA Approves RI Rpt - Rev 1 0 days Wed 3/30/16 Sat 12/10/16 400 Prepare FS Report 255 days 401 Submit Alternatives Array Tech Memo to USEPA 0 days Wed 3/30/16 Wed 3/30/16 Receive USEPA Comments on Alternatives Array Tech Memo 0 days Sun 5/29/16 Sun 5/29/16 403 Submit FS Rpt - Rev 0 to USEPA 0 days Wed 7/13/16 Wed 7/13/16 Receive USEPA Comments on FS Rpt - Rev 0 Sun 9/11/16 Sun 9/11/16 404 0 days Wed 10/26/16 Wed 10/26/16 405 Submit FS Rpt - Rev 1 to USEPA 0 days Sat 12/10/16 USEPA approves FS Rpt - Rev 1 0 days Sat 12/10/16 406 407 212 days Sun 12/11/16 Mon 7/10/17 Record of Decision Sun 12/11/16 Wed 2/8/17 USEPA prepares Prelminary Remedial Action Plan 60 days 408 Preliminary Remedial Action Plan Public Review Thu 2/9/17 Sun 4/9/17 60 days 409 Wed 4/12/17 Mon 7/10/17 410 USEPA issues Record of Decision 90 days 411 412 413 Pitney Court Station OU Site ID: SSID B5HP 1166 days Fri 8/30/13 Mon 11/7/16 169 days Fri 8/30/13 Fri 2/14/14 414 Project Planning
Submit Completion Rpt/Site Specific Work Plan - Revision 0 to USEPA Fri 8/30/13 Fri 8/30/13 415 0 days Receive USEPA Comments on Draft Completion Report/SSWP Revision 0 Wed 11/27/13 Wed 11/27/13 0 days 416 Submit Completion Report/Site Specific Work Plan Revision 1 to USEPA Mon 1/13/14 Mon 1/13/14 417 0 days Fri 2/14/14 USEPA Approves Completion Rpt/SSWP Revision 1 Fri 2/14/14 418 0 days 419 Initiate RI Field Work - Upland 440 days Sat 2/15/14 Thu 4/30/15 Mon 3/31/14 Contractor Procurement and Permitting 45 days Sat 2/15/14 421 Soil Boring Installation/Sampling 14 days Wed 4/16/14 Tue 4/29/14 Groundwater Monitoring Well Installation/Development 14 days Wed 4/30/14 Tue 5/13/14 Soil Gas Probe Installation 5 days Wed 5/14/14 Sun 5/18/14 423 Wed 5/21/14 Fri 5/30/14 424 First Quarter RI GW and Soil Gas Sampling 10 days 425 Laboratory Analysis (first Quarter gw, soil gas, and soil) 30 days Sat 5/31/14 Sun 6/29/14 60 days Sat 7/5/14 Tue 9/2/14 426 Data Validation (first Quarter gw. soil gas, and soil) 427 10 days Tue 8/19/14 Thu 8/28/14 Second Quarter RI GW and Soil Gas Sampling Fri 8/29/14 Sat 9/27/14 30 days 428 Laboratory Analysis (second Quarter gw and soil gas) Tue 10/7/14 Wed 11/5/14 429 Data Validation (second Quarter gw and soil gas) 30 days Fri 10/31/14 430 Data Gap Analysis 14 days Sat 10/18/14 Third Quarter RI GW Sampling 10 days Mon 11/17/14 Wed 11/26/14 432 Laboratory Analysis (third Quarter gw) 30 days Thu 11/27/14 Fri 12/26/14 Data Validation (third Quarter gw) 30 days Thu 1/1/15 Fri 1/30/15 Fourth Quarter RI GW Sampling 10 days Sun 2/15/15 Tue 2/24/15 434 Wed 2/25/15 Thu 3/26/15 435 Laboratory Analysis (fourth Quarter gw) 30 days Thu 4/30/15 436 Data Validation (fourth Quarter gw) 30 days Wed 4/1/15 437 Prepare RI Report 236 days Wed 3/11/15 Mon 11/2/15 Review Preliminary RI Data with USEPA Wed 3/11/15 Wed 3/11/15 0 days 438 Mon 6/1/15 439 Submit RI Rot - Rev 0 to USEPA 0 days Mon 6/1/15 Fri 7/31/15 Fri 7/31/15 0 days Receive USEPA Comments on RI Rot - Rev 0 Mon 8/17/15 Mon 8/17/15 441 Review Response to USEPA Comments on RI Rpt - Rev 0 with USEPA 0 days 442 Submit RI Rpt - Rev 1 to USEPA 0 days Wed 9/16/15 Wed 9/16/15 443 USEPA Approves RI Rpt - Rev 1 0 days Mon 11/2/15 Mon 11/2/15 Prepare FS Report 255 days Fri 7/31/15 Mon 4/11/16 445 Submit Alternatives Array Tech Memo to USEPA 0 days Fri 7/31/15 Fri 7/31/15 Receive USEPA Comments on Alternatives Array Tech Memo Tue 9/29/15 Tue 9/29/15 446 0 days 447 Submit FS Rpt - Rev 0 to USEPA 0 days Fri 11/13/15 Fri 11/13/15 448 Receive USEPA Comments on FS Rpt - Rev 0 0 days Tue 1/12/16 Tue 1/12/16 449 Submit FS Rot - Rev 1 to USEPA 0 days Fri 2/26/16 Fri 2/26/16 Mon 4/11/16 Mon 4/11/16 450 USEPA approves FS Rpt - Rev 1 0 days Manual Summary Rollup Finish-only Inactive Summary Rolled Up Task Group By Summary Project: 1982 PGL MGP proposed schedule 131030 Date: Fri 11/1/13 Manual Task Milestone Rolled Up Milestone External Tasks Inactive Task C **Duration-only** Summary Rolled Up Progress **Project Summary** Inactive Milestone . This preliminary schedule is dependent on USEPA-approval and weather conditions to completed field investigations.

2013 Master Schedule Update - Revision 0 Peoples Gas Light and Coke Company Former Manufactured Gas Plant Sites CERCLA Docket No. V-W-08-C-917 ID Task Name 451 452 USEPA prepares Prelminary Remedial Action Plan Preliminary Remedial Action Plan Public Review 453 USEPA issues Record of Decision 454 455 456 North Shore Avenue Station Site ID: SSID B5HL 457

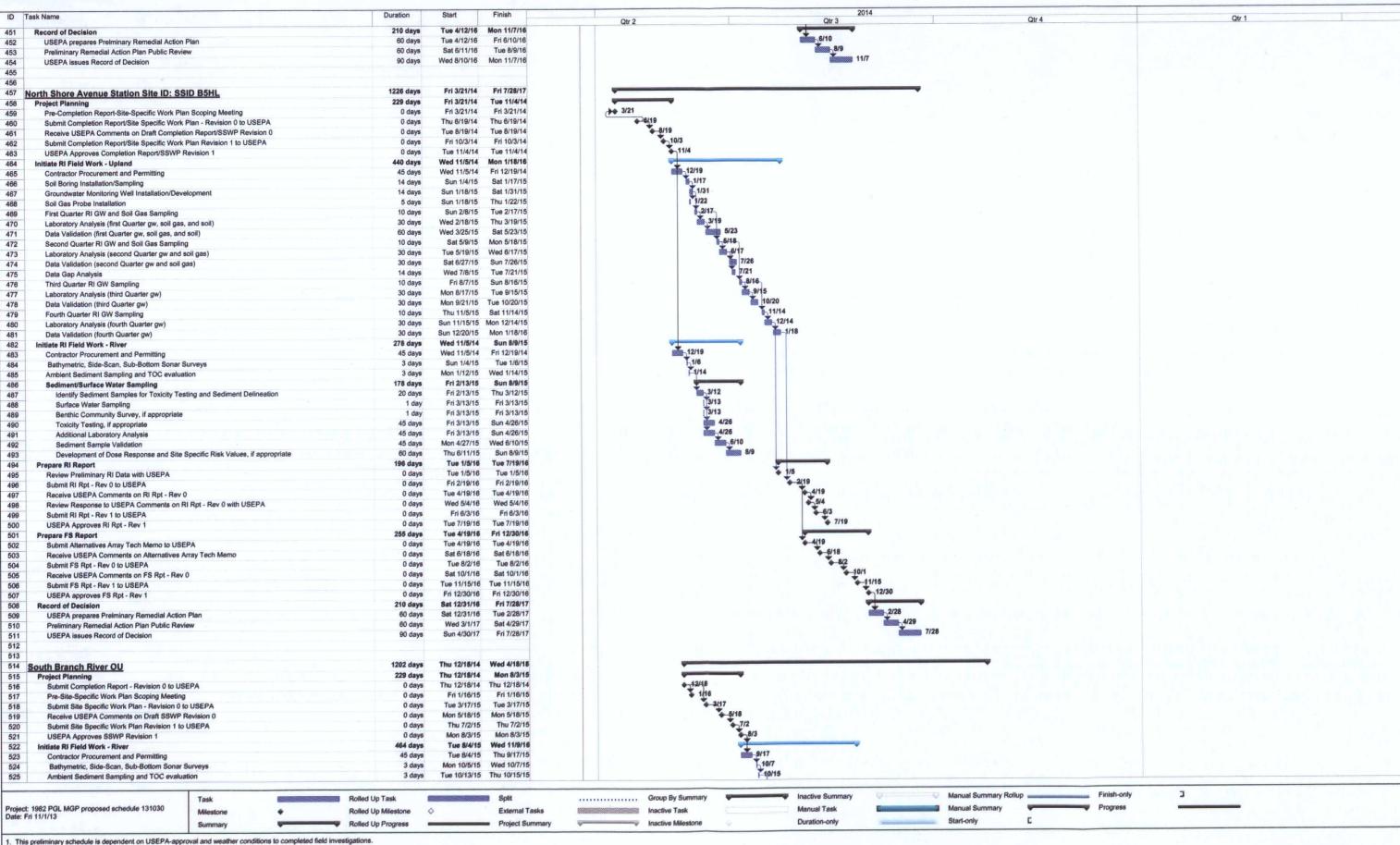


FIGURE 1
2013 Master Schedule Update - Revision 0
Peoples Gas Light and Coke Company Former Manufactured Gas Plant Sites
CERCLA Docket No. V-W-08-C-917

ID	Task Name	Duration	Start	Finish		2014		6.4
			** *****	DE 141046	Qtr 2	Qtr 3	Qtr 4	Qtr 1
26	Sediment/Surface Water Sampling	360 days	Mon 11/16/15			¥ 10111		
27	Identify Sediment Samples for Toxicity Testing and Sediment Delineation	20 days	Mon 11/16/15			12/11		
28	Surface Water Sampling	1 day	Mon 12/14/15			112/14		
29	Benthic Community Survey, if appropriate	1 day	101011 1001110	Mon 12/14/15		12/14		
30	Toxicity Testing, if appropriate	45 days	Sat 12/12/15			1/25		
31	Additional Laboratory Analysis	45 days	Sat 12/12/15			1/25		
32	Sediment Sample Validation	45 days	Tue 1/26/16			3/10		
33	Development of Dose Response and Site Specific Risk Values, if appropriate	60 days	Fri 3/11/16			5/9		
34	Submit Sediment Sampling Tech Memo to USEPA	0 days	Mon 5/9/16			♦ 25/9		
35	Receive USEPA Comments on Sediment Sampling Tech Memo	0 days	Wed 6/8/16	The second particles with the second		6/8		
36	Step II Sediment Sampling, if necessary	45 days	Mon 6/27/16	Wed 8/10/16	8 /10			
537	Step II Laboratory Analysis, if necessary	30 days	Thu 8/11/16	100 CO		₹ ,9/9		
38	Step II Data Validation, if necessary	56 days	Thu 9/15/16		39/29			
39	Prepare RI Report	176 days	Thu 9/29/16					
40	Review Preliminary RI Data with USEPA	0 days	Thu 9/29/16					
41	Submit RI Rpt - Rev 0 to USEPA	0 days	100 8 10 10 10 10 10 10 10 10 10 10 10 10 10	Mon 10/24/16		↓ 10/24		
42	Receive USEPA Comments on RI Rpt - Rev 0	0 days	Fri 12/23/16			12/23		
43	Review Response to USEPA Comments on RI Rpt - Rev 0 with USEPA	0 days	Sun 1/8/17			1/8		
44	Submit RI Rpt - Rev 1 to USEPA	0 days	Tue 2/7/17	Tue 2/7/17		2/7		
45	USEPA Approves RI Rpt - Rev 1	0 days	Fri 3/24/17	Fri 3/24/17		→ 3/24		
46	Prepare FS Report	255 days	Fri 12/23/16			the second secon		
47	Submit Alternatives Array Tech Memo to USEPA	0 days	Fri 12/23/16		e 2/21/17 Fri 4/7/17 4/7			
48	Receive USEPA Comments on Alternatives Array Tech Memo	0 days	Tue 2/21/17					
49	Submit FS Rpt - Rev 0 to USEPA	0 days	Fri 4/7/17	Fri 4/7/17				
50	Receive USEPA Comments on FS Rpt - Rev 0	0 days	Tue 6/6/17	Tue 6/6/17			6/6	
51	Submit FS Rpt - Rev 1 to USEPA	0 days	Fri 7/21/17				♦ -7/21	
52	USEPA approves FS Rpt - Rev 1	0 days	Mon 9/4/17	Mon 9/4/17			9/4	
53	Record of Decision	210 days	Tue 9/5/17	Wed 4/18/18			V	
54	USEPA prepares Prelminary Remedial Action Plan	60 days	Tue 9/5/17				11/3	
55	Preliminary Remedial Action Plan Public Review	60 days	Sat 11/4/17	Tue 1/2/18			1/2	
556	USEPA issues Record of Decision	90 days	Wed 1/3/18	Wed 4/18/18			4/18	

Project: 1982 PGL MGP proposed schedule 131030 Date: Fri 11/1/13 Task Rolled Up Task Split Inactive Summary Inactive Summary Inactive Summary Manual Summary Manual Summary Projects Manual Summary Projects Summary Rolled Up Milestone Rolled Up Progress Project Summary Rolled Up Ro
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